

IN THE UNITED STATES DISTRICT COURT
FOR MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

MARTHA SWANN,)	
)	
Plaintiff,)	
)	Case No.: 3:24-cv-00244-JTA
vs.)	
)	JURY DEMAND
EAST ALABAMA HEALTH CARE)	
AUTHORITY, DBA EAST ALABAMA)	
MEDICAL CENTER,)	
)	
Defendant.)	

PLAINTIFF'S INTERROGATORY 28 AND
REQUEST FOR PRODUCTION BB TO DEFENDANT
EAST ALABAMA MEDICAL CENTER

COMES NOW the Plaintiff, by and through counsel of record, and by / under Rules 26(b)(1), 33 and 34 of the Federal Rules of Civil Procedure, and hereby requests Defendant East Alabama Medical Center, answer the following Interrogatory 28 within the time allowed by law; and, following the Interrogatory, provide the documents requested in Request for Production BB within the time allowed by law.

Definitions:

1. As used in these Interrogatories, and unless otherwise indicated, “**Defendant**” and “**EAMC**” means/refers to Defendant East Alabama Health Care Authority, dba East Alabama Medical Center, and additionally means/refers to Defendant's Board of Directors, officers, doctors, employees, agents and representatives; “you” and “your” mean Defendant EAMC.

2. As used in these Interrogatories, “**Morris**” means EAMC employee John Morris; “**Johnston**” means EAMC employee Susan Johnston; “**Truitt**” means EAMC

employee Kelli Truitt; “**Casey**” means EAMC employee Roben Casey; “**Grill**” means EAMC employee Laura Grill.

3. As used in these Interrogatories, “**Plaintiff**” means Plaintiff Martha Swann.

4. As used in these Interrogatories -- besides its plain, common-English meaning -- “**training**” means seminars, symposiums, continuing education, courses, classes, and similar organized gatherings at which information is taught by and/or imparted to employees by an expert, or faculty, or person, or company, designated by EAMC to share with or otherwise provide information to EAMC employees policies regarding workplace discrimination.

5. As used in these Interrogatories, unless otherwise defined or refined, the term “**employee**” means any/all person/s employed by EAMC.

6. As used in these Interrogatories, unless otherwise specified, the term “**Complaint**” means Plaintiff’s Complaint and the term “**Answer**” means Defendant EAMC’s Answer (Doc. 8) to Plaintiff’s Complaint.

7. As used in these Interrogatories the words “**investigate**,” “**investigation**,” and “**investigated**” refer to (a) any/all investigation/s made by EAMC in response to any grievance / complaint made by Plaintiff regarding gender discrimination (in pay or otherwise) during her employment through the January 31, 2023 with EAMCs; and/or, (b) any opposition to EAMC policies, practices and/or decisions made, as expressed / communicated by Plaintiff to any EAMC employee as such involved or gender discrimination (including, but not necessarily limited to, pay-related).

8. As used herein, the word “**communicate/d**” means told, informed, or otherwise conveyed information from one person to another person. For the purposes of the following discovery requests, communicated does not include information that may have been read by a person as part of their individual computer-based E-Learning session.

9. As used in these Interrogatories, “**any**” means one or more, and “any / all.”

10. “Document,” “documents” and “materials,” mean and include any record or method of recording information, including but not limited to: letters, emails, text messages, call logs, interview transcripts, forms, handbooks, policies, records, licenses, permits, receipts, written contracts, written agreements, bills, invoices, bank statements, reports, logs, call logs, applications, pay stubs, statements, ledgers, notes, memoranda, spread sheets, drawings, diagrams, photographs, audio recordings and videotapes, computer disks or flash drives or cloud-stored information, printouts, pictures, and other data compilations from which information can be obtained, translated if necessary, by you through detection devices into reasonably usable form. The terms “document” and “documents,” in addition to their foregoing meaning, are to be broadly construed and defined. **Note:** To the extent any requested documents or materials (e.g., E-Learning policies / lessons / modules / tests / assessments / Power Points and the like) are web-based, documents requested that are in this format may be converted to pdf then produced.

INSTRUCTIONS:

A. If a privilege to not answer is claimed, please identify each matter to which the privilege is claimed, the nature of the privilege claimed and the legal & factual basis of each claim.

B. If EAMC's refusal to answer any interrogatory is stated on the grounds of being “burdensome,” please identify any/all documents to be searched in order for you to be able to answer any such “burdensome” interrogatory, the location of such documents and each person or entity that must be consulted regarding said documents.

C. Please answer each interrogatory on the basis of all information known by or reasonably available to EAMC, including -- but not limited to -- all information maintained in EAMC's records, files, archives, employee files; accessible by EAMC's Board of Directors, officers, doctors, managers, supervisors, and other employees, including electronically stored information (e.g., in EAMC-owned and/or employee-accessible laptops, hard discs, flash drives, cell/smart phones, and the like) and/or other persons with whom or which EAMC is affiliated.

D. If any interrogatory cannot be answered in full, please answer to the greatest extent possible, and specify any/all reason(s) for your inability to provide a complete answer.

Plaintiff's Interrogatory 28 to EAMC

Interrogatory 28: As of the final week or December 2022 and January 2023, please detail in writing how (i.e, the EAMC procedure, policy, practice or custom for the steps to be followed by) EAMC Human Resources personnel to reserve the Edward Lee Spencer, Jr., Board Room (Board Room) at EAMC. Along with the steps that were taken, please include the following information:

(a) The name and job title of the person who made the reservation / request for reservation for the Board Room for the Martha Swann grievance hearing of January 24, 2023.

(b) All information regarding the reservation / use of the Board Room included in the (request / notification of) reservation (e.g., along with date and time block, the purpose of reservation, requestor name, persons expected to participate in the meeting / hearing / training / etc.).

(c) The names of all persons notified / checked with / asked about reserving the Board Room for the January 24, 2023, Martha Swann grievance hearing.

(d) During the period from December 27, 2022, through the time the January 24, 2023, Martha Swann grievance hearing commenced, the names of all persons notified regarding the use of the Board Room for the grievance hearing.

NOTE: *To the extent there was / were no policy, procedure, practice or custom for reserving the Board Room in last December 2022 and January 2023, please nevertheless provide the steps taken to reserve the Board Room for the January 24, 2023, Martha Swann grievance hearing and the information requested in this Interrogatory's subparts (a)-(d).*

Plaintiff's Request for Production BB

Please produce copies of the following documents:

Request for Production BB.

All documents (e.g., emails, text messages, and any other writings, etc.) relating to Plaintiff's foregoing Interrogatory 28.

Undersigned Plaintiff's attorney served the above Interrogatory and Request for introduction on Defendant EAMC's counsel on this, the 21st day of January, 2025.

s/ Richard R. Newton

Richard R. Newton, Attorney at Law, P.C.

Counsel for Plaintiff Martha Swann

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ASB-0776-w85r

CERTIFICATE OF SERVICE

This is to certify that on this, the 21st day of January, 2025, I served the foregoing Plaintiff's Interrogatory 28 and Requests for Production BB on Defendant EAMC by sending same by email to its attorneys of record via their respective emails of record, to wit:

Warren Lightfoot, Esq. *wlightfoot@maynardnexsen.com*
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Maynard Nexsen PC
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s/ Richard R. Newton